



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1997

BY FACSIMILE AND
FIRST-CLASS MAIL

E. Mark Braden, Esq.
Baker & Hostetler
1050 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036-5304

RE: MUR 3774

Dear Mr. Braden

This confirms that the deposition of Wes Anderson, originally scheduled for April 16, will instead take place on April 24 beginning at 2:30 p.m. at our office. As I advised your secretary Rosemary when she phoned to convey the time you and Mr. Anderson would be available, given the later starting time, it is possible that we may need to continue the deposition on Friday, April 25. Although I don't now anticipate that such a continuation will be necessary, I wanted you to be aware that it is a possibility in case you or Mr. Anderson need to make arrangements to be available then.

Additionally, as we discussed in our phone conversation on Monday, April 14, you agreed to check with your client, the American Defense Foundation/American Defense Institute ("ADF/ADI"), on several items requiring clarification in their response to the Commission's February 11, 1997 Subpoena/Order. Specifically, you agreed to provide a copy of the invoice relating to ADF's \$25,000 payment to John Grotta in October 1992 or to confirm that there either is no such invoice or that your client does not have a copy. Additionally, you agreed to check whether your client has copies of, and if so to produce, scripts for the video PSAs distributed in October 1992 (see Interrogatory No. 3 and Document Request No. 2) and for the November 1992 Georgia runoff election (see Interrogatory No. 6 and Document Request No. 3). As you will note, the only script produced by your clients refers to the November 8 general election. The 1992 general election, however, was held on November 3.

Finally, in further reviewing your clients' response to the February 11 Subpoena/Order, we note that your response to Interrogatory No. 4 states that there was no direct mailing to Georgia voters in 1992. However, ADF's February 20, 1996 correspondence clarifying ADF

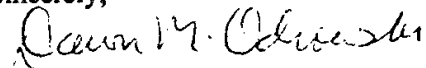
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responses to Question 5 of the Commission's first set of interrogatories, states that a letter referencing the 1992 U.S. Senate runoff in Georgia "was mailed to approximately 30,000 military personnel who are registered to vote in Georgia." Moreover, we note that a copy of one of the invoices your client has just produced from John Grotta (Invoice 1013, dated 11/25/92) contains a reference to "Georgia" accompanied by a \$3,000 charge. Please explain.

Please provide the information requested above by Wednesday, April 23. Moreover, I would appreciate it if you could complete the enclosed designation of counsel for Wes Anderson for our records.

I look forward to seeing you on April 24. Please contact me if you have any questions.

Sincerely,



Dawn M. Odrowski